

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
SHARI L. KAUFMAN  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax

6 Attorneys for Frank Chavez

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 FRANK CHAVEZ,

14 Defendant.

Case No. 2:15-CR-00035-RFB-CWH

**STIPULATION TO CONTINUE**  
**STATUS CONFERENCE**

(Second Request)

15  
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Alexandra M. Michael, Assistant United States Attorney, counsel  
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
19 Shari L. Kaufman, Assistant Federal Public Defender, counsel for Frank Chavez, that the status  
20 conference currently scheduled for June 1, 2016 at 1:30 p.m., be vacated and continued to a  
21 date and time convenient to the Court, but no earlier than twenty (20) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defense counsel will be out of town.  
24 2. The parties agree to the continuance.  
25 3. The additional time requested herein is not sought for purposes of delay.  
26 4. Denial of this request for continuance could result in a miscarriage of justice.

1 This is the second request for a continuance of the status conference filed herein.

2 DATED this 26<sup>th</sup> day of May, 2016.

3  
4 RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

5  
6 */s/ Shari L. Kaufman*  
By \_\_\_\_\_  
7 SHARI L. KAUFMAN  
8 Assistant Federal Public Defender

*/s/ Alexandra M. Michael*  
By \_\_\_\_\_  
ALEXANDRA M. MICHAEL  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 FRANK CHAVEZ,

7 Defendant.

Case No. 2:15-CR-00035-RFB-CWH

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

- 13 1. The defense counsel will be out of town.  
14 2. The parties agree to the continuance.  
15 3. The additional time requested herein is not sought for purpose of delay.  
16 4. Denial for this request for continuance could result in a miscarriage of justice.

17 DATED this 26<sup>th</sup> day of May, 2016.

18  
19 **ORDER**

20 IT IS FURTHER ORDERED that the status conference hearing scheduled on  
21 Wednesday, June 1, 2016 at 1:30 p.m., be vacated and continued to Tuesday, June 28, 2016  
22 at the hour of 1:30 p.m.; or to a time and date convenient to the court.

23 DATED this 27<sup>th</sup> of May, 2016.

24  
25 

26 RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE